

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN GENERAL LIFE  
INSURANCE CO.,

Plaintiff,

v.

STANLEY MANN, THE STANLEY  
MANN 2007 INSURANCE TRUST,  
CHRISTIANA BANK & TRUST CO., as  
Trustee, and JOHN DOES 1-10,

Defendants.

Misc No. 10-MC-00024-P1

(Case Pending in the District of Delaware:  
CA No. 09-434-GMS)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that pursuant to Rules 26(c) and 45(c)(3) of the Federal Rules of Civil Procedure and upon the accompanying Memorandum of Law in Opposition to Defendants' Motion to Compel Compliance with Subpoenas and in Support of Non-Party American International Group, Inc.'s ("AIG's") Cross-Motion to Quash Defendants' Rule 45 Subpoena and Strike Paragraphs 18 through 22 of the Declaration of Elise A. Yablonski, Declarations of Viola Beckford, Evan Koch, Patrick M. Burke and Marc Falcone, the exhibits annexed thereto, and all prior proceedings in this action, non-party AIG by their attorneys Paul, Weiss, Rifkind, Wharton & Garrison LLP, will move this Court at a date and time to be determined by the Court at Part 1, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an order granting AIG's motion to quash the subpoena issued by the United States District Court for the Southern District of New York and served on AIG by defendants Stanley Mann 2007 Insurance Trust and Wilmington Savings Fund Society (as successor-in-interest to Christiana Bank & Trust Company), as Trustee and to strike Paragraphs 18 through 22 of the Declaration of Elise A. Yablonski in Support of Defendants' Motion to

Compel filed on December 30, 2010, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
January 17, 2011

PAUL, WEISS, RIFKIND, WHARTON &  
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